

**ND ASSOCIATION OF COUNTIES FUND
INVESTMENT PERFORMANCE REPORT AS OF DECEMBER 31, 2004**

	December-04					September-04				Current	Prior Year	3 Years	5 Years
	Market Value	Allocation	Actual	Quarter	Month	Market Value	Allocation	Actual	Quarter	FYTD	FY04	Ended	Ended
				Net ROR	Net ROR				Net ROR	Net	Net	6/30/2004	6/30/2004
												Net	Net
LARGE CAP DOMESTIC EQUITY													
<i>Structured Growth</i>													
Los Angeles Capital	9,658	3.0%	3.0%	10.37%	4.86%	8,922	2.9%	3.0%	-4.14%	5.80%	N/A	N/A	N/A
Total Structured Growth	9,658	3.0%	3.0%	10.37%	4.86%	8,922	2.9%	3.0%	-4.14%	5.80%	17.58%	-6.28%	N/A
Russell 1000 Growth				9.17%	3.92%				-5.23%	3.47%	17.86%	-3.74%	N/A
<i>Structured Value</i>													
LSV	10,400	3.2%	3.0%	9.01%	2.72%	9,730	3.2%	3.0%	3.21%	12.51%	30.56%	9.33%	N/A
Russell 1000 Value				10.38%	3.35%				1.54%	12.08%	21.13%	2.96%	N/A
<i>Russell 1000 Enhanced Index</i>													
LA Capital	20,371	6.2%	6.0%	9.28%	3.67%	19,007	6.2%	6.0%	-1.68%	7.44%	N/A	N/A	N/A
Russell 1000				9.80%	3.62%				-1.81%	7.81%	N/A	N/A	N/A
<i>S&P 500 Enhanced Index</i>													
Westridge	19,795	6.1%	12.0%	9.47%	3.44%	18,468	6.0%	12.0%	-1.99%	7.29%	N/A	N/A	N/A
S&P 500				9.23%	3.40%				-1.87%	7.19%	N/A	N/A	N/A
<i>Index</i>													
State Street	5,954			9.23%	3.42%	5,559			-1.88%	7.17%	19.01%	-0.75%	N/A
Total Index	5,954	1.8%	2.0%	9.23%	3.42%	5,559	1.8%	2.0%	-1.88%	7.17%	19.01%	-0.75%	N/A
S&P 500				9.23%	3.40%				-1.87%	7.19%	19.11%	-0.70%	N/A
TOTAL LARGE CAP DOMESTIC EQUITY	66,178	20.3%	20.0%	9.45%	3.60%	61,686	20.1%	20.0%	-1.42%	7.90%	21.46%	0.15%	N/A
S&P 500				9.23%	3.40%				-1.87%	7.19%	19.11%	-0.70%	N/A
SMALL CAP DOMESTIC EQUITY													
<i>Manager-of-Managers</i>													
SEI	33,708	10.3%	10.0%	14.79%	3.88%	31,955	10.4%	10.0%	-3.60%	10.66%	32.99%	5.51%	N/A
Russell 2000 + 200bp				14.64%	3.13%				-2.36%	11.93%	35.99%	7.90%	N/A
TOTAL SMALL CAP DOMESTIC EQUITY	33,708	10.3%	10.0%	14.79%	3.88%	31,955	10.4%	10.0%	-3.60%	10.66%	32.99%	5.54%	N/A
Russell 2000				14.09%	2.96%				-2.86%	10.83%	33.36%	6.24%	N/A
CONVERTIBLES													
TCW	32,908	10.1%	10.0%	8.41%	2.91%	30,822	10.0%	10.0%	-4.35%	3.69%	17.50%	1.03%	N/A
First Boston Convertible Index				5.37%	2.08%				-1.05%	4.26%	14.16%	4.89%	N/A
INTERNATIONAL EQUITY													
<i>Large Cap - Active</i>													
Capital Guardian	13,031	4.0%	4.0%	10.01%	3.66%	24,445	7.9%	8.0%	-1.77%	8.07%	25.36%	-0.39%	N/A
LSV	13,117	4.0%	4.0%	N/A	4.80%	-	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A
Transition Account	(4)	0.0%	0.0%	N/A	N/A	-	0.0%	0.0%	N/A	N/A	N/A	N/A	N/A
Total Large Cap - Active	26,144	8.0%	8.0%	10.59%	4.21%	24,445	7.9%	8.0%	-1.77%	8.64%	25.36%	-0.39%	N/A
MSCI EAFE - 50% Hedged				11.11%	3.85%				-0.72%	10.31%	26.98%	-1.27%	N/A
<i>Small Cap - Value</i>													
Lazard	3,676	1.1%	1.0%	16.09%	4.65%	3,284	1.1%	1.0%	0.29%	16.42%	43.30%	N/A	N/A
Citigroup Broad Market Index < \$2BN				16.82%	4.90%				-0.82%	15.86%	47.95%	N/A	N/A
<i>Small Cap - Growth</i>													
Vanguard	3,579	1.1%	1.0%	18.89%	7.12%	3,120	1.0%	1.0%	0.49%	19.47%	44.68%	N/A	N/A
SSB BROAD MARKET INDEX < \$2BN				16.82%	4.90%				-0.82%	15.86%	47.95%	N/A	N/A
TOTAL INTERNATIONAL EQUITY	33,399	10.2%	10.0%	12.55%	4.55%	30,850	10.0%	10.0%	-1.31%	11.07%	29.16%	1.02%	N/A
MSCI EAFE - 50% Hedged				11.11%	3.85%				-0.72%	10.31%	26.98%	-1.27%	N/A
DOMESTIC FIXED INCOME													
<i>Core Bond</i>													
Western Asset	51,290	15.7%	15.0%	1.34%	1.06%	48,621	15.8%	15.0%	3.52%	4.91%	2.42%	7.77%	N/A
Lehman Aggregate				0.96%	0.92%				3.20%	4.18%	0.32%	6.35%	N/A
<i>Index</i>													
Bank of ND	64,671	19.8%	22.5%	0.40%	0.67%	61,187	19.9%	22.5%	2.54%	2.95%	0.07%	7.10%	N/A
Lehman Intermediate Gov/Credit (1)				0.44%	0.68%				2.71%	3.16%	-0.05%	6.97%	N/A
<i>BBB Average Quality</i>													
Wells Capital (formerly Strong)	28,849	8.8%	7.5%	2.30%	1.68%	27,259	8.9%	7.5%	4.51%	6.92%	1.18%	N/A	N/A
Lehman US Credit BAA				1.69%	1.56%				4.76%	6.53%	1.96%	N/A	N/A
TOTAL DOMESTIC FIXED INCOME	144,810	44.4%	45.0%	1.11%	1.01%	137,067	44.6%	45.0%	3.27%	4.41%	0.79%	7.00%	N/A
Lehman Gov/Credit				0.80%	1.06%				3.56%	4.39%	-0.72%	6.73%	N/A
CASH EQUIVALENTS													
Bank of ND	15,307	4.7%	5.0%	0.53%	0.21%	15,247	5.0%	5.0%	0.44%	0.97%	1.20%	1.72%	N/A
90 Day T-Bill				0.48%	0.21%				0.37%	0.85%	0.98%	1.71%	N/A
TOTAL NDACo FUND	326,311	100.0%	100.0%	5.78%	2.25%	307,626	100.0%	100.0%	0.20%	5.99%	12.43%	4.55%	4.70%
POLICY TARGET BENCHMARK				5.24%	2.06%				0.80%	6.08%	10.55%	4.44%	4.41%

NOTE: Monthly returns and market values are preliminary and subject to change.

(1) Prior to April 1, 2004, the benchmark was the LB Govt/Credit index.